

FILED
JAN 19 2012
DAVID CREWS, CLERK
BY [Signature]
Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

ROGER WOODS

PLAINTIFF

Vs.

CAUSE NO.: 1:12W13-MS

MONROE COUNTY, MISSISSIPPI

DEFENDANT

COMPLAINT

COMES NOW, the Plaintiff, Roger Woods, and demands judgment against Monroe County, Mississippi for damages, and in support would show the following:

1.

That the Plaintiff, Roger Woods, is an adult resident of Lee County, Mississippi who resides at 1235 Bogan Drive, Tupelo, MS 38801.

2.

That the Defendant, Monroe County, Mississippi, is a governmental entity where process can be served upon its registered agent, Ronnie Boozer, Monroe County Chancery Court Clerk, Monroe County Chancery Court, Commerce Street, Aberdeen, MS 39730.

4.

That on or about April 19, 2009, Plaintiff was a passenger in a vehicle that had broken down alongside Highway 45 in Monroe County, Mississippi.

5.

That on or about April 19, 2009, Monroe County Sheriff Deputy Eric Sloan, in his scope of employment as a Monroe County Sheriff's Deputy, arrived at the scene of the broken down vehicle.

6.

That Deputy Sloan requested Plaintiff, Roger Woods, to exit the vehicle and place his hands on the vehicle.

7.

That Deputy Sloan requested Plaintiff, Roger Woods, to remove all personal items in his possession and on his person.

8.

That Plaintiff Woods complied and handed Deputy Sloan his wallet and other personal belongings.

9.

That Deputy Sloan removed, with deliberate design, monies in the amount of ONE-THOUSAND, TWO-HUNDRED and TWENTY-FOUR DOLLARS (\$1,224.00) in cash from Woods' wallet.

10.

That said monies were the proceeds from an insurance settlement check Woods received legally.

11.

That Deputy Sloan took said monies, with deliberate design and to cause loss and injury to Woods, and that such taking was an illegal forfeiture, and amounted to theft.

12.

That said illegal forfeiture and theft was a deprivation of Woods' constitutional rights, in particular the Fourth Amendment of the United States Constitution, and was a violation of 42 USC § 1982, 1983 and other Federal and State statutes.

13.

That Defendant, Monroe County, Mississippi, is vicariously liable for the acts of its employee, Eric Sloan, during the course and scope of his employment with Monroe County, Mississippi.

WHEREFORE PREMISES CONSIDERED, the Plaintiff, Roger Woods, demands judgment against Monroe County, Mississippi and Deputy Eric Sloan for the amount of \$1,224.00, and is entitled to other damages in an amount to determined by a jury for compensation for the violations of his constitutional rights, as well as prejudgment, post judgment interest, attorney fees, court costs, and all other damages to be decided by a trier of fact.

RESPECTFULLY SUBMITTED, this the 13th day of January, 2012.

ROGER WOODS, PLAINTIFF
BY: Brandon Scott Leslie
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